

The Honorable Ronald B. Leighton

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

JUDITH COX and CHARLES COX
individually and as Personal
Representatives of the Estates of C.J.P.
and B.T.P.,

Plaintiffs,

v.

STATE OF WASHINGTON,
DEPARTMENT OF SOCIAL AND
HEALTH SERVICES, FOREST
JACOBSON, ROCKY STEPHENSON,
JANE WILSON, and BILLIE REED-
LYYSKI,

Defendants.

NO. 14-05923RBL

DECLARATION OF PETER J.
HELMBERGER IN SUPPORT OF
DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION FOR
RECONSIDERATION

PETER J. HELMBERGER hereby declares under penalty of perjury under the laws of the
state of Washington that the following is true and correct:

1. I am over the age of 18, competent to testify as to the matters stated herein and
make this declaration based on my personal knowledge. I am one of the Assistant Attorneys
General assigned to represent the State of Washington in this case.

1 2. I am attaching complete copies of the transcripts from the hearings referenced in
2 Defendants' Response to Plaintiffs' Motion for Reconsideration as they were inadvertently not
3 filed in their entirety earlier.

4 3. Attached as Exhibit A is a true and correct copy of the complete transcript from
5 the September 27, 2011 hearing from the third party custody case of *Cox v. Powell*, Pierce County
6 Superior Court Cause No. 11-3-03627-7. This document was produced to the plaintiffs on March
7 3, 2014 with Defendants' Third Supplemental Answers to Plaintiff's First Interrogatories and
8 Requests for Production.

9 4. Attached as Exhibit B is a true and correct copy of the complete transcript from
10 the September 27, 2011 hearing from the dependency case of C.P. and B.P., Pierce County Cause
11 Nos. 11-7-01802-8 and 11-7-01803-6. This document was produced to the plaintiffs on March 3,
12 2014 with Defendants' Third Supplemental Answers to Plaintiff's First Interrogatories and
13 Requests for Production.

14 5. Attached as Exhibit C is a true and correct copy of the complete transcript from
15 the September 28, 2011 hearing from the dependency case of C.P. and B.P., Pierce County Cause
16 Nos. 11-7-01802-8 and 11-7-01803-6. This document was produced to the plaintiffs on March 3,
17 2014 with Defendants' Third Supplemental Answers to Plaintiff's First Interrogatories and
18 Requests for Production.


19 6. Attached as Exhibit D is a true and correct copy of the complete transcript from
20 the October 26, 2011 hearing from the dependency case of C.P. and B.P., Pierce County Cause
21 Nos. 11-7-01802-8 and 11-7-01803-6. This document was produced to the plaintiffs on March 3,
22 2014 with Defendants' Third Supplemental Answers to Plaintiff's First Interrogatories and
23 Requests for Production.

24 7. Attached as Exhibit E is a true and correct copy of excerpts of the deposition of
25 Gary L. Sanders, taken on September 18, 2014.
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8. Attached as Exhibit F is a true and correct copy of excerpts of the deposition of Teresa Berg, taken on September 18, 2014.

9. Attached as Exhibit G are true and correct copies of the Affidavit for Order to Seal the Search Warrant signed by Detective Gary Sanders, along with the Order to Seal, dated August 24, 2011; and a copy of the Order Unsealing Search Warrants and Affidavits dated March 30, 2012.

DATED this 9 day of November, 2015 in Tacoma, Washington.


PETER HELMSBERGER, WSBA No. 23041
Assistant Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November, 2015, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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